

# **EXHIBIT 4**

GOODWIN PROCTER

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**Via E-Mail**

William D. Schultz  
Merchant & Gould P.C.  
3200 IDS Center  
80 South 8th Street  
Minneapolis, MN 55402-2215

**Re: *ePlus, Inc. v. Lawson Software, Inc.*  
Civil Action No. 3:09cv620 (REP)**

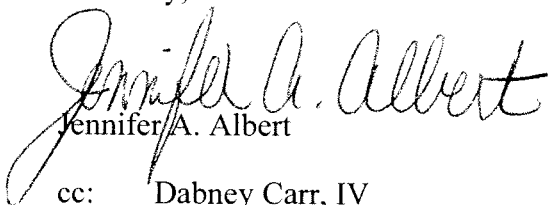
Dear Will:

I write to address Lawson's continued failure to provide information regarding the implementation of the software modules from Lawson's S3 and M3 Supply Chain Management suites for its customers on a customer-by-customer basis. Although Lawson agreed to supplement its answer to Interrogatory No. 24 in response to deficiencies previously noted by *ePlus*, this supplementation remains deficient. The scope of Interrogatory No. 24 properly includes information on the implementation of these modules. For example, the interrogatory makes clear that Lawson's "answer must include, without limitation, an identification of all Lawson customers that have purchased, licensed, used, and/or ***implemented*** any of the above-identified modules from May 2003 to the present, and the ***combinations/configurations/arrangements of such modules for each such customer.***"

*ePlus* requests that Lawson promptly supplement its response to Interrogatory No. 24 to address this ongoing deficiency. As specifically requested by this interrogatory, Lawson must, at the least, state on a customer-by-customer basis the current configuration of the licensed modules implemented for each customer.

Thank you for your attention to this matter.

Sincerely,

  
Jennifer A. Albert

cc: Dabney Carr, IV